

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MUEIN DAOUD)	
)	
Plaintiff,)	21-cv-6663
)	
)	Judge Jorge L. Alonso
)	
v.)	Judge Heather K. McShain
)	
THE CITY OF CHICAGO, CHICAGO)	
POLICE OFFICER MANUEL)	
PAREDES, STAR NO. 16850,)	
LIEUTENANT SHOSHI, STAR NO.)	
236, SERGEANT CHATTY AND)	
UNKNOWN AND UNNAMED)	
PERSONS)	
)	
)	
Defendants,)	

**PARTIES' JOINT MOTION FOR LEAVE FOR PLAINTIFF
TO FILE AN AMENDED COMPLAINT**

Plaintiff Muein Daoud (“Plaintiff”), by and through his attorney, Edward M. Fox of ED FOX & ASSOCIATES, Defendant City of Chicago (“the City”), by and through its attorney, Celia Meza, Corporation Counsel for the City of Chicago, and Chicago Police Officers Manuel Paredes (“Paredes”), and Leonard Shoshi (“Shoshi”), by and through one of their attorneys, Alexander Michelini, Assistant Corporation Counsel Supervisor, (collectively, “Parties”), for their joint motion for leave for Plaintiff to file an amended complaint, state as follows:

1. The Court ordered the City and Defendants Paredes and Shoshi to answer or otherwise plead by April 6, 2022, and for Plaintiff to complete service on an additional police officer, Defendant Chatty, by April 22, 2022. Dkt. 14.

2. The City and Defendants Paredes and Shoshi were preparing to submit a motion to dismiss the present complaint.

3. However, during a call today, Plaintiff's counsel informed defense counsel that he expected that he planned to amend his complaint to name additional defendants from the Chicago Park District.

4. Any Amendment to Plaintiff's Complaint would make Defendants' Responsive pleading moot.

5. Counsel believe it is therefore in the best interest of the parties and the Court for Plaintiff to be given sufficient time to amend his complaint, for Defendant Chatty and any additional parties to have time to find representation and for all defendants to be on the same schedule to answer or otherwise plead.

6. The parties therefore respectfully request that Plaintiff be given leave to amend his complaint by April 29, 2022, that the City, Defendants Parades and Shoshi have until May 20, 2022 to answer or otherwise plead to the amended complaint.

WHEREFORE, the parties respectfully request that Plaintiff be given leave to amend his complaint by April 29, 2022, that the City, Defendants Parades and Shoshi answer or otherwise plead by May 20, 2022 and for any further relief this Court deems appropriate and just.

Dated: April 6, 2022

Respectfully submitted,

/s/ Edward M. Fox
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Attorneys for Defendants Parades and Shoshi

CERTIFICATE OF SERVICE

I certify that on April 6, 2022, I served a copy of Parties' Joint Motion For Leave For Plaintiff to File An Amended Complaint to all attorneys of record via the Court's ECF system.

/s/ Raoul Vertick Mowatt
Raoul Vertick Mowatt
Assistant Corporation Counsel III